

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN OF PENNSYLVANIA**

**IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
LITIGATION**

No. 12-md-2323 (AB)

MDL No. 2323

**THIS DOCUMENT RELATES TO:
DUERSON**

**PLAINTIFF DUERSON'S MOTION TO PERMIT THE TAKING OF
MR. SEEGER'S DEPOSITION**

Plaintiff, Tregg Duerson, Personal Representative of the Estate of Dave Duerson, deceased, moves this Court for an order allowing one of his attorneys, Thomas A. Demetrio, to take the deposition of Co-Lead Counsel, Chris Seeger. Why?

Due to the lateness of the hour it is only through the deposition of Co-Lead Counsel, Chris Seeger, who on behalf of all class members negotiated with NFL attorneys, that pertinent information can be acquired prior to October 14, 2014.

Because it is axiomatic that "It is important to have an informed understanding of the dynamics of the settlement discussions and negotiations, the participants, and the steps taken by those negotiating on the plaintiffs' behalf to protect the procedural and substantive rights and interests of those whose claims they propose to settle,"¹ it is equally important that the attorneys for the thousands of plaintiffs and tens of thousands of absent class members (whose rights and interests are being forever affected by the terms of the proposed settlement) know and understand how this controversial proposed settlement was reached.

¹David F. Herr, Annotated Manual for Complex Litigation §22.921 (4th ed. 2006).

In further support of said motion, the Affidavit of Thomas A. Demetrio is attached hereto and made a part hereof.

WHEREFORE, Plaintiff, Tregg Duerson, Personal Representative of the Estate of Dave Duerson, deceased, requests this Court enter an order allowing one of his attorneys, Thomas A. Demetrio, to take the deposition of Co-Lead Counsel, Chris Seeger.

/s/ Thomas A. Demetrio

Thomas A. Demetrio

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